

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>In re:</b>	)	<b>Chapter 11 Proceeding</b>
	)	
<b>D.M.G. SECURITY, INC.,</b>	)	<b>Case No. 23-15180</b>
	)	
<b>Debtor.</b>	)	<b>Hon, Donald R. Cassling</b>
	)	

**NOTICE OF MOTION**

TO: See attached list

PLEASE TAKE NOTICE that on January 16, 2024, at 10:00 a.m., I will appear before the Honorable Donald R. Cassling, or any judge sitting in that judge's place, either in courtroom 619 of the Dirksen Federal Courthouse, 219 S. Dearborn Street, Chicago, Illinois, or electronically as described below, and present the motion of D.M.G. SECURITY, INC., MOTION TO SHORTEN NOTICE ON MOTION FOR AUTHORITY TO USE CASH COLLATERAL, and for Other Relief, a copy of which is attached.

Important: Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person.

To appear by Zoom using the internet, go to this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode.

To appear by Zoom using a telephone, call Zoom for Government at 1-669-254-5252 or 1646-828-7666. Then enter the meeting ID and passcode.

Meeting ID and passcode. The meeting ID for this hearing is Meeting ID: 161 414 7941, and the passcode is 619. The meeting ID and passcode can also be found on the judge's page on the court's website.

In addition to other grounds for opposing the motion, you may oppose the motion on the basis that emergency treatment is not appropriate.

D.M.G. SECURITY, INC.  
By: /s/ William E. Jamison, Jr.  
Attorney for Debtor

CERTIFICATE OF SERVICE

I, William E. Jamison, Jr., certify that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on January 10, 2024, at 5:00 p.m.

Electronic Service through CM/ECM System

Patrick S. Layng  
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PNC Bank

Deven B. Chavda

Manager

Following parties Via Regular Mail First Class Postage-Prepaid

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Chicago Transit Authority

c/o Kent S. Ray

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Chicago, IL 60661

Com Ed

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Carol Stream, IL 60197

Comcast

1255 W. North Avenue

Chicago, IL 60642

Exeter

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Irving, TX 75016

Illinois Department of Employment

33 State Street 10th Floor

Chicago, IL 60603

Illinois Workers Compensation Comm

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J Goodwin & Associates

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Chicago, IL 60643

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WA Geroge Insurance e 155  
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Philadelphia, PA 19176

Proven IT  
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Park, IL 60487

T - Mobile  
1400 Opus PL  
Downers Grove, IL 60515

The Hartford  
One Hartford Plaza  
Hartford, CT 06155

J.P. Morgan Chase  
Bankruptcy Intake Team  
700 Kansas Lane 1<sup>st</sup> Floor  
Monroe, IL 71203

Internal Revenue Service  
Mail Stop 5014 CHI  
230 Dearborn Steet Rm 2600  
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D.M.G. Security, Inc.  
11828 S. Western Ave  
Chicago, IL 60643

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
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<b>In re:</b>	)	<b>Chapter 11 Proceeding</b>
	)	
<b>D.M.G. SECURITY, INC.,</b>	)	<b>Case No. 23-15180</b>
	)	
<b>Debtor.</b>	)	<b>Hon, Donald R. Cassling</b>
	)	

**MOTION TO SHORTEN NOTICE ON  
MOTION FOR AUTHORITY TO USE CASH COLLATERAL**

D.M.G. SECURITY, INC. (the “D.M.G.”) for Debtor’s Motion for Authority to Use Cash Collateral, Provide Adequate Protection, and for Other Relief, states:

**JURISDICTION**

1. This Court has jurisdiction over this Case according to 28 USC. §§157(b)(1) and 1334. The Motion represents a core proceeding under 28 USC. §157(b)(2)(A), (M), and (O). Venue is proper under 28 USC. §§1408 and 1409.

2. This Court has the authority to grant the relief requested under § 105 of the Bankruptcy Code and Rule 9007 of the Federal Rules of Bankruptcy Procedure.

**BACKGROUND**

3. On November 10, 2023, (the “Petition Date”), the Debtor filed a voluntary petition for relief under Sub-chapter V of Chapter 11 of the Bankruptcy Code. The Debtor is operating its business as a debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

4. The Court has core jurisdiction over this matter under 28 U.S.C. §§ 157(b)(2)(A) and 1334.

5. That William B. Avellone of Chartered Management Company is the Subchapter V Trustee in the Debtor’s Chapter 11 proceedings.

6. Debtor is a Small Minority owned Corporation that operates a Security company out of its primary location at 11828 S. Western Chicago, IL 60643.

7. The Debtor's primary contracts are with Chicago Transit Authority and Cook County providing essential security services to various locations throughout the City of Chicago.

8. The Debtor commenced the Chapter 11 Case to restructure operations to maximize value for creditors and other constituents. Debtor contemplates reorganization by acquiring new contracts and more importantly streamlining receipt of receivable with existing contracts which will allow the Debtor to emerge quickly from bankruptcy as a stronger and healthier enterprise, generating a meaningful recovery for creditors.

#### RELIEF SOUGHT

9. D.M.G. on November 15, 2023, Debtor filed its Emergency Motion for Use of Cash Collateral, providing notice to its creditors albeit on an expedited basis. Subsequently an evidentiary hearing was held on December 11, 2023, wherein the court denied debtor's use of cash collateral.

9. The Debtor and Secured Creditor, United Capitol Funding Corporation (United) having reached an agreement as to the use of cash collateral seeks to provide notice of hearing of a Motion for Entry of a Second Interim Order Authorizing Use of Cash Collateral.

10. Debtor submits that an immediate need for use of cash collateral is necessary for the continued operation of debtor's business in the normal course.

11. Debtor seeks the entry of an order allowing it to present its motion concerning the use of cash collateral on January 16, 2024. The debtor's secured creditors have not objected to D.M.G.'s request for the use of cash collateral as of the filing of this motion. Similarly, its largest secured creditor agrees to the use of cash collateral and agrees with the shortened date of a hearing on cash collateral.

12. The use of cash collateral will be essential for D.M.G. to reorganize successfully.

13. D.M.G. has attached its proposed motion for the use of cash collateral as Exhibit A, a proposed order concerning the use of cash collateral as Exhibit B, and proposed 15- and 30day budgets as Exhibits C and D.

WHEREFORE, D.M.G. SECURITY, INC. respectfully requests the entry of an Order by this Court shortening the notice required upon the Debtor's Motion for Authority to Use Cash Collateral, Provide Adequate Protection, and for Other Relief to January 16, 2024, at 10:00 a.m.

D.M.G. SECURITY, INC.

By: /s/ William E. Jamison, Jr.  
Attorney for Debtor

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